

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**Case No. 21-CR-151-TDD**

**BILLY JAMES MENEES and  
ASHLEY DAWN MARIE SCHARDEIN,**

*Defendants.*

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**GOVERNMENT’S PROPOSED SUMMARY OF THE INDICTMENT**

Both Defendants are charged in a two-count indictment. Count one is Child Abuse in Indian Country and count two is Child Neglect in Indian Country.

In count one the Government alleges that the Defendants committed Child Abuse in Indian Country in violation of 18 U.S.C. §§ 1151, 1152, 2 & 21 Okla. Stat. 843.5(A) between January 1, 2019, and May 9, 2020. Billy James Menees, a non-Indian, and Ashley Dawn Marie Schardein, a non-Indian were responsible for the health, safety and welfare of K.M., an Indian child under the age of eighteen, and did willfully and maliciously cause and threaten harm, fail to protect from harm and threaten harm, torture and injure K.M. within the Eastern District of Oklahoma, in Indian Country.

In count two the Government alleges that the Defendants committed Child Neglect in Indian Country in violation of 18 U.S.C. §§ 1151, 1152, 2 & 21 Okla. Stat. 843.5(C) between January 1, 2019, and May 9, 2020. Billy James Menees, a non-Indian, and Ashley Dawn Marie Schardein, a non-Indian were responsible for the health, safety and welfare of K.M., an Indian child under the age of eighteen, and did willfully and maliciously fail and omit to provide K.M. adequate nurturance and affection, food, clothing, shelter, sanitation, hygiene, medical care and supervision, within the Eastern District of Oklahoma, in Indian Country.

Respectfully submitted,

CHRISTOPHER J. WILSON  
United States Attorney

s/ Nicole Paladino  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2023, I electronically transmitted the attached documents to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Cody L. Cofer and Kara L. Carreras, Attorneys for Defendant Menees  
Ronald Gainor and Lynn A. Pierce, Attorneys for Defendant Schardein

s/ Nicole Paladino  
NICOLE PALADINO  
Assistant United States Attorney